

Excerpt from 10/31 Resolution Plan

D-044889

Comment/Response Summary of the Work in Progress Water Quality Affected Environment Report

Water Quality Component Report Parameters of Concern Section 3	<p>The agency is concerned with organic carbon being characterized as pollution caused by agricultural operations in the Delta. It is our belief that at least an equivalent amount of organic carbon would be generated by the natural decomposition of decaying plant materials and peat soils. We ask that you modify the report as follows:</p> <p>Page 3-5, last paragraph should be modified as follows: MWQI studies have documented that Delta exports contain <u>relatively high concentrations of DOC which are representative of average concentrations found in raw drinking water in the Wester United States.</u>decomposing peat soil and crop residues <u>are the major sources of DOC in the Delta contribute on the average some 20 % of the DOC in the water which are exported from the Delta.</u>Utilities must undertake <u>studies efforts</u> to control organic carbon in their source water if TOC exceeds 2 mg/l at the water intake <u>or modify disinfection methods to reduce the formation of THM compounds during disinfection.</u></p>	Thomas M. Zuckerman, Central Delta Water Agency	8/13/97	<p>RICK'S Response - undated: Thank you for your comments on the Component Report. I agree we need to be careful how organic carbon inputs to the Delta are portrayed. I also agree with your contention that evidence is lacking to prove organic carbon contributions from Delta islands under agricultural production are greater than might be the case under "natural" conditions. Therefore, there is inadequate scientific support for blaming Delta agricultural interests for causing pollution that exceeds historical conditions. On the other hand, discharges from islands do affect Delta water quality adversely with respect to drinking water supply. From this perspective, organic carbon is a pollutant. In my view, water quality degradation from whatever source is undesirable; and, I think this would be true of discharges from Delta islands whether resulting from agricultural practices or natural conditions. Therefore, I believe it should be CALFED's interest to support measures to reduce problems from this source where feasible, without an intention to single out individuals as causes of the problem. We do not intend to finalize the Draft Component Report, as this is only a working document provided for the use of the WQTG. We intend to incorporate your comments into the Water Quality Technical Appendix to the CALFED Programmatic EIR/EIS where this material will formally appear. Specifically, the changes you recommend to page E-4, last paragraph and page 3-5 first paragraph, seventh sentence, will be adopted. Your comments on Section 2, page 2-2 and page 3-5 last paragraph make reference to average DOC levels found in drinking water supplies in the U.S. We are aware of one or more nationwide surveys. However, it is not clear whether this reference is to one of these surveys or from another source. We would appreciate your providing us with specific support for the <u>statements you recommend.</u></p> <p>October 28, 1997: No references provided as of this date. Comments not incorporated into October 31, 1997, version.</p>
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